

January 24, 2003

CERTIFIED MAIL #9059 2931

Herbert Berg
Accurate Metal Detinning, Inc.
P.O. Box 9
Hammond, Indiana, 46325

Re: Registered Construction and Operation Status,
089-16715-00445

Dear Mr. Berg:

The application from Accurate Metal Detinning received on October 25, 2002 has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following Metal Detinning Process to be located at 2230 Indianapolis Boulevard, Hammond, Indiana, is classified as registered:

This batch-type process involves the reclamation of tin-coated brass punchings through agitation in one (1) of ten (10) rotary mixers containing heated caustic solution. Each mixer is equipped with a 0.4 MMBtu/hr natural gas burner to heat the caustic solution. Particulate emissions generated while unloading detinned brass punchings from the mixers into shipping containers shall be controlled by one (1) of three (3) portable Dust Collectors with manufacturer's rated control efficiency of 99.9% each. The maximum design rate of the process is 12 tons per year.

The following conditions shall be applicable:

Pursuant to Hammond Air Quality Control Ordinance 3522 (as amended), the source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of source classification.

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the Detinning Process shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where

E = rate of emission in pounds per hour and
P = process weight rate in tons per hour
(P = 12 tons per year)

This calculation gives a limit of 21.67 pounds per hour (94.91 tons per year) of Particulate Matter. The Company will be held to 0.03 grains per dry standard cubic foot per Hammond Air Quality Control Ordinance No. 3522 (as amended), which limits the PM to 1.96 pounds per hour (8.585 tons per year). The Dust Collectors shall be in operation at all times the mixers are unloaded, in order to comply with this limit.

This registration is the first State Registration issued to this source, the Company has been operating under Local Operation Permits. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality (OAQ) and the Hammond Department of Environmental Management (HDEM) that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue
Room 304
Hammond, Indiana 46320

and

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 and Hammond Air Quality Control Ordinance 3522 (as amended) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Ronald Novak, HDEM Director

KM

cc: Permit Administrator - Mindy Hahn

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3).

Company Name: Accurate Metal Detinning Inc.
Address: 2230 Indianapolis Boulevard
City: Hammond
Authorized Individual: Herbert Berg
Phone #: (219) 659-6150
Registration #: 089-16715-00445

I hereby certify that Accurate Metal Detinning, Inc. is still in operation and is in compliance with the requirements of Registration 089-16715-00445.

Name (typed): Herbert Berg
Title: President
Signature:
Date:

**Indiana Department of Environmental Management
Office of Air Quality
And
Hammond Department of Environmental Management
Air Pollution Control Division**

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name: Accurate Metal Detinning, Inc.
Source Location: 2230 Indianapolis Boulevard, Hammond, Indiana
County: Lake
SIC Code: 3449 – Miscellaneous Metalwork
Operation Permit No.: 089-16715-00445
Permit Reviewer: Kristina Massey

The Hammond Department of Environmental Management has reviewed an application from Accurate Metal Detinning, Inc. relating to the operation of the scrap metal detinning process.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

This batch-type process involves the reclamation of tin-coated brass punchings through agitation in one (1) of ten (10) rotary mixers containing heated caustic solution. Each mixer is equipped with a 0.4 MMBtu/hr natural gas burner to heat the caustic solution. Particulate emissions generated while unloading detinned brass punchings from the mixers into shipping containers shall be controlled by one (1) of three (3) portable Dust Collectors with manufacturer's rated control efficiencies of 99.9%. The maximum design rate of the process is 12 tons per year.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

OP 02083, issued on February 21, 2002.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Director that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on October 25, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (two (2) pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	14.74
PM-10	14.74
SO ₂	0.01
VOC	0.04
CO	0.17
NO _x	0.83

The potential to emit (as defined in 326 IAC 2-7-1(29)) of Particulate Matter (PM) is less than or equal to 100 tons per year. Therefore, the source is **not** subject to the provisions of 326 IAC 2-7. However, the potential to emit is greater than 5 tons per year and less than 25 tons per year of Particulate Matter (PM) therefore, a Registration Letter will be issued along with a local Operation Permit.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 HDEM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.0105
PM-10	0.0105
SO ₂	0.0020
VOC	0.0179
CO	0.0676
NO _x	0.3382
HAP (specify)	0

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Moderate Nonattainment
SO ₂	Primary Nonattainment
NO ₂	Attainment/Unclassifiable
Ozone	Severe Nonattainment
CO	Attainment/Unclassifiable
Lead	Primary Nonattainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Lake County has been classified as nonattainment for Particulate Matter less than 10 microns (PM-10). Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.0397
PM10	0.0397
SO ₂	0.0050
VOC	0.0442
CO	0.1669
NO _x	0.8343

Plant-wide potentials after controls

This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and no nonattainment regulated pollutant is emitted at a rate of 100 tons per year, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the Hammond Department of Environmental Management (HDEM) staff.

Federal Rule Applicability

There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Lake County and the potential to emit VOC and NO_x is less than ten (10) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM₁₀ is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

However, pursuant to Hammond Air Quality Control Ordinance 3522 (as amended), the source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of source classification.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the Detinning Process shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

(P = 12 tons per year)

This calculation gives a limit of 21.67 pounds per hour (94.91 tons per year) of Particulate Matter. The Company will be held to 0.03 grains per dry standard cubic feet per Hammond Air Quality Control Ordinance No. 3522 (as amended), which limits the PM to 1.96 pounds per hour (8.585 tons per year). The Dust Collectors shall be in operation at all times the mixers are unloaded, in order to comply with this limit.

Conclusion

The operation of this Metal Detinning Process shall be subject to the conditions of the attached Registration and local Operation Permit.

ALABAMA POWER LAW (CDS)/EIS CALCULATIONS

ACCURATE METAL DETINNING, INC.

2230 Indianapolis Boulevard
Hammond, Indiana 46394

PLANT ID NO: ----
INSP DATE: 9/13/01
CALC DATE: 2/19/02

CALCULATIONS BY: Kristina Massey

YEAR OF DATA: **2001**

NO. OF POINTS: 1
NO. OF SEGMENTS: 2

NOTES

EF: EMISSION FACTOR
CE: CONTROL EFFICIENCY

MDR: MAXIMUM DESIGN RATE
MDC: MAXIMUM DESIGN CAPACITY

Ts: STACK DISCHARGE TEMPERATURE
UNITS FOR EMISSIONS ARE IN (TPY) EXCEPT WHERE GIVEN

PT 1; SGM 1: SCRAP METAL DETINNING PROCESS:
UNLOADING OF DETINNING SCRAP
FROM (8) MIXERS

MDR (T/hr): 12.0
YEARLY PROD (T/yr): 2732.15
39588
STACK ID (DIAM:HEIGHT):
FLOWRATE (ACFM): 7600
Ts(°F): 70

CNTRL DEV: Dust Collector

PERMITTED OPERATING HRS: **8760** hr/yr

SCC NO. 3-05-104-07			POTENTIAL EMISSIONS						ALLOWABLE		COMPANY ACTUAL	
			BEFORE CONTROLS			AFTER CONTROLS					BEFORE CONTROLS	AFTER CONTROLS
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)		
PM	0.28	0.999	3.3600	80.6400	14.7168	0.0034	0.0147	0.0000	1.9542857	8.560	0.3825	0.0004
PM10	---	0	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	0.000	0.000	#VALUE!	#VALUE!
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.000	0.000	0.0000	0.0000
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.000	0.000	0.0000	0.0000
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.000	0.000	0.0000	0.0000
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.000	0.000	0.0000	0.0000
LEAD	---	0	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	N/A	0.000	0.000	#VALUE!	#VALUE!

PM: 0.03 gr/dscf HAQC Ordinance No. 3522

NOTES:

- MDR limited by number of Dust Collectors (3). Typical load is 12,000 lbs; it takes approx 1.5 hrs to unload the mixer. DC's only used during unloading; 1 per mixer.
- EF obtained through material balance. SCC number used only as reference.

Example: 5 lbs of dust were collected during the unloading of 36,000 lbs (18 Tons) of brass punchings.
Therefore, EF = 5 lbs/18 tons = 0.28 lb/ton.

- Based on material processed

PT 1; SGMT 2: (In-process Fuel Usage)

MDC (mmBtu/hr): 2.0

HEAT CONTENT (Btu/cft): 1,050

STACK ID (DIAM:HEIGHT): (0.67 : 34)

KEWANEE BOILER

MDR (mmcft/hr): 0.0019

QTY BURNED (mmcft/yr): 6.76

FLOWRATE (ACFM): 371.00

CNTRL DEV: NONE

Ts(°F): 300

PERMITTED OPERATING HRS: 8760 hr/yr

SCC NO. 3-90-006-89			POTENTIAL EMISSIONS						ALLOWABLE		COMPANY ACTUAL	
POLLUTANT	EF(lbs/MMcft)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)	BEFORE CONTROLS	AFTER CONTROLS
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)				
PM	3	0	0.0057	0.1371	0.0250	0.0057	0.0250	0.0026	0.0057	0.025	0.0101	0.0101
PM10	3	0	0.0057	0.1371	0.0250	0.0057	0.0250	0.0026	N/A	N/A	0.0101	0.0101
SOx	0.6	0	0.0011	0.0274	0.0050	0.0011	0.0050	N/A	0.0011	0.005	0.0020	0.0020
NOx	100	0	0.1905	4.5714	0.8343	0.1905	0.8343	N/A	0.1905	0.834	0.3382	0.3382
VOC	5.3	0	0.0101	0.2423	0.0442	0.0101	0.0442	N/A	0.0101	0.044	0.0179	0.0179
CO	20	0	0.0381	0.9143	0.1669	0.0381	0.1669	N/A	0.0381	0.167	0.0676	0.0676
LEAD	---	0	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	N/A	#VALUE!	#VALUE!	#VALUE!	#VALUE!

THIS BOILER IS USED TO HEAT THE CAUSTIC SOLUTION USED IN THE DETINNING PROCESS.

Hammond AQC Ordinance No. 3522 (as amended)

Applicable Regulation:

Total: PLANT-WIDE

Hammond Air Quality Control Ordinance No. 3522

		POTENTIAL EMISSIONS						ALLOWABLE		COMPANY ACTUAL	
POLLUTANT	POLLUTANT	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)	BEFORE CONTROLS	AFTER CONTROLS
		(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)				
PM	PM	3.3657	80.7771	14.7418	0.0091	0.0397	0.0000	1.960	8.585	0.3926	0.0105
PM10	PM10	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	N/A	N/A	#VALUE!	#VALUE!
SOx	SOx	0.0011	0.0274	0.0050	0.0011	0.0050	#VALUE!	0.001	0.005	0.0020	0.0020
NOx	NOx	0.1905	4.5714	0.8343	0.1905	0.8343	#VALUE!	0.190	0.834	0.3382	0.3382
VOC	VOC	0.0101	0.2423	0.0442	0.0101	0.0442	#VALUE!	0.010	0.044	0.0179	0.0179
CO	CO	0.0381	0.9143	0.1669	0.0381	0.1669	#VALUE!	0.038	0.167	0.0676	0.0676
LEAD	LEAD	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!

THIS SOURCE IS CLASSED "REGISTERED" ACCORDING TO POTENTIAL PM EMISSIONS.